

PINC REVISION RECORDS

Note: See the Actual PINC Changes listed at the bottom of this document. The Changes are highlighted in yellow.

APPENDIX 9

Last Update December 2005

TESTING PROCEDURE FOR SCSSV, TUBING PLUG, AND INJECTION VALVE

NOTE: The testing methods listed in this updated Appendix 9 are acceptable through April 2000.

MAXIMUM ALLOWABLE LEAKAGE RATE

Gas - 5 cubic feet per minute

Liquid - 200 cubic centimeters per minute

Note:

1. The listed testing procedures are for wells that **do not produce H₂S**. For wells that produce H₂S, pressure must be bled into a closed system, such as pressure vessels or a flare system, using H₂S resistant material.
2. For SCSSV testing:
 - A. Use either Method A or Method B for normal wells for gas.
 - B. Use Method C for questionable wells or low pressure wells for gas.
 - C. Use Method E for liquid.
3. For pump-through plug or injection valve testing
 - A. Use Method D for gas.
 - B. Use Method E for liquid.

Method A:

1. Shut-in the well at the wellhead.
2. Wait for a minimum 5 minutes and record SITP.
3. Bleed SCSSV hydraulic control line pressure to zero to shut-in SCSSV.
4. Bleed surface pressure sufficiently to establish a differential pressure across SCSSV of approximately 20 percent of the SITP recorded in Step 2.
5. Wait a minimum of 30 minutes and record surface pressure.
6. Surface pressure recorded in Step 5 confirms SCSSV holding integrity or the need to determine leakage rate addressed in Step 7.
7. Determine gas leakage rate using the following formula:

$$\text{Leakage rate (SCF/min)} = \frac{Cd^2h(p_2-p_1)}{T_{\text{TEST}}}$$

Where: C = 0.000363

d = Inside diameter of tubing in inches

h = Distance between valve and tree in feet

p₁ = Initial pressure reading in psi

p₂ = Final pressure reading in psi

T_{TEST} = Time lapsed during test in minutes

Method B:

1. Shut-in the well at the wellhead.
2. Bleed SCSSV hydraulic control line pressure to zero to shut-in SCSSV.
3. Bleed surface pressure to ambient pressure.
4. Close bleed valve.
5. Attach Direct-Reading flowmeter.
6. Slowly open bleed valve and record gas leakage rate determined by flowmeter.
7. Close the bleed valve.
8. Remove the Direct-Reading flowmeter and return the SCSSV to service.

Method C:

1. Close the SCSSV to be tested.
2. Position valve(s) as required to permit pressure to bleed downstream of the SCSSV, and bleed downstream pressure.
3. Close the bleed valve.
4. Attach the inlet of the Direct-Reading flowmeter to the bleed valve using hose barb and plastic tubing and keep flowmeter in the vertical position.
5. With pressure on the upstream side of the SCSSV, slowly open the bleed valve downstream of the SCSSV and record the leakage rate.
6. If leakage occurs, verify that the SCSSV is actually leaking, and not the FSV, wing valve, or gas trapped in the crown valve.
7. Close the bleed valve.
8. Disconnect hose barb and plastic tubing from the bleed valve and return the SCSSV to service.

Method D:

1. Record SITP.
2. Bleed surface pressure sufficiently to establish a pressure differential across pump-through plug or injection valve of approximately 20 percent of the SITP recorded in Step 1.
3. Wait a minimum of 30 minutes and record surface pressure.
4. Surface pressure recorded in Step 3 confirms pump-through or injection valve holding integrity, or the need to determine leakage rate addressed in Step 5.
5. Determine gas leakage with the following formula:

$$\text{Leakage rate (SCF/min)} = \frac{Cd^2h(p_2-p_1)}{T_{\text{TEST}}}$$

Where: C = 0.000363

d = Inside diameter of tubing in inches

h = Distance between valve and tree in feet

p₁ = Initial pressure reading in psi

p₂ = Final pressure reading in psi

T_{TEST} = Time lapsed during test in minutes

Method E:

For wells that contain no gas, determine leakage rate by capturing the leaking liquid in a measuring device.

Effective August 25, 2005

Members in attendance:

Tom Perry – National PINC Team Leader – HQ

Jack Leezy – FO – Gulf of Mexico Region

David Nedorostek – HQ

Ralph Vasquez – FO – Pacific Region

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Randy Howell – FO – Alaska Region

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The following is a detailed description of the changes made to each affected PINC on the PINC List on August 25, 2005.

General – Identification

Revised PINC G-117

Change: PINC Authority was revised.

Rationale: Revision to the PINC Authority citation was required to account for material changes in the most recent volume of the Code of Federal Regulations (CFR).

Revised PINC G-802

Change: PINC Authority was revised.

Rationale: Revision to the PINC Authority was required to clarify the requirements in Subpart I and Subpart Q.

Revised PINC G-803

Change: PINC Inspection procedure was revised.

Rationale: Revision to the Inspection Procedure was made to better indicate what is to be inspected.

Revised PINC G-811

Change: PINC Authority was revised.

Rationale: Revision to the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-843

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions to the PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision of the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-845

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions to the PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision of the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-846

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions to the PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision of the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-847

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions to the PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision of the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-850

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions to the PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision of the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-851

Change: PINC Statement, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: PINC Statement, Inspection Procedure, and Noncompliance Statement were revised to better indicate what is to be inspected.

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Revised PINC G-852

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions to the PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision of the PINC Authority was required to clarify the requirements of Subpart Q.

Revised PINC G-855

Change: PINC Inspection Procedure and Noncompliance Statement were revised.

Rationale: Revisions to the Inspection Procedure and Noncompliance Statement were made to better indicate what is to be inspected.

Revised PINC G-857

Change: PINC Statement, Authority, Inspection Procedure, and Noncompliance Statement were all slightly revised.

Rationale: Revisions to PINC Statement, Inspection Procedure, and Noncompliance Statement were made to better indicate what is to be inspected. Revision to PINC Authority was required to clarify the requirements of Subpart O.

Pollution

Revised PINC E-100

Change: PINC Noncompliance Statement was revised.

Rationale: Revisions were made to better indicate what is to be inspected and what actions will be taken should an inspection deliver a finding of noncompliance.

Drilling

Revised PINC D-174 (D-823)

Change: PINC was renumbered and reclassified as an office PINC.

Rationale: PINC D-174 referred to well completion paper work. It was decided that the inspection criteria for this PINC made it better suited for inclusion as an office PINC than as a field PINC.

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Well-Workover

Added PINC W-101

Change: PINC was added.

Rationale: PINC was added to address the requirements of Subpart F as it refers to equipment movement to and from different wells.

Deleted PINC W-153

Change: PINC was deleted.

Rationale: PINC W-153 was deleted because it was duplicated by PINC W-101.

Production

Revised PINC P-103

Change: PINC Enforcement Action and Noncompliance Statement were both revised to delete references to warning action (W); receiving this PINC from now on will result in a component shut-in only.

Rationale: The Warning (W) action was deleted because the vast majority of the W INCS were due to inadvertent actions.

Revised PINC P-280

Change: PINC Inspection Procedure and Noncompliance Statement were revised.

Rationale: Revisions were made to the PINC Inspection Procedure and Noncompliance Statement to better indicate what is to be inspected.

Added PINC P-434

Change: PINC was added.

Rationale: PINC was added to highlight the requirement in Subpart A that all pressure vessels on OCS facilities be managed in accordance with industry recognized best practices.

Pipelines

Added PINC L-127

Change: PINC was added.

Rationale: PINC was added to address the requirements of Subpart J concerning safety equipment for DOI pipelines.

Revised PINC L-841

Change: PINC Statement was revised.

Rationale: Revision was made to better indicate what is to be inspected.

Measurements & Site Security

Revised PINC M-110

Change: PINC Statement, Inspection Procedure, and Noncompliance Statement were all revised.

Rationale: Revisions were made to better indicate what is to be inspected.

Revised PINC M-127

Change: PINC Statement was revised.

Rationale: Revision of the PINC Statement was required to better indicate what is to be inspected.

Revised PINC M-131

Change: PINC Statement, Inspection Procedure, and Noncompliance Statement were revised.

Rationale: Revisions were made to better indicate what is to be inspected.

Crane

Revised PINC I-102

Change: PINC Statement and Procedure were revised.

Rationale: Revisions were made to better indicate what is to be inspected.

Revised PINC I-131

Change: PINC Inspection Procedure was revised.

Rationale: The revision was made to better indicate what is to be inspected.

Electrical

Added PINC F-103

Change: PINC was added.

Rationale: PINC was added to ensure that rechargeable battery systems on the OCS do not pose any undue explosive risk.

Revised PINC F-104

Change: PINC Inspection Procedure was revised.

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Rationale: Revision to the PINC Inspection Procedure was required to better indicate what is to be inspected.

Added PINC F-121

Change: PINC was added.

Rationale: PINC was added to satisfy the requirements of Subpart A to ensure that all equipment on a structure is properly grounded.

NATIONAL PINC TEAM REVISIONS

EFFECTIVE AUGUST 25, 2005

NOTE: The additions to revised PINCs and the deletions from the deleted old PINCs are highlighted in yellow.

REVISED PINC

G-117 IS REQUIRED PAPERWORK SUBMITTED PRIOR TO CONDUCTING AN ACTIVITY OR OPERATION WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 465 Enforcement Action: W

468

513(a)

613(a)

613(d)

1008

1202(c)(4)

1202(d)(5)

1202(f)(2)

1203(b)(8)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when paperwork has not been submitted within the required time frame.

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DELETED PINC

G-117 IS REQUIRED PAPERWORK SUBMITTED PRIOR TO CONDUCTING AN ACTIVITY OR OPERATION WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 465 Enforcement Action: W

468

513(a)

613(a)

613(d)

703(c) Delete

1008

1202(c)(4)

1202(d)(5)

1202(f)(2)

1203(b)(8)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when paperwork has not been submitted within the required time frame.

INSPECTION FORM:

Enter one item checked per facility.

REVISED PINC

E-100 IS THE LESSEE PREVENTING POLLUTION OF OFFSHORE WATERS AND, IF POLLUTION IS DETECTED, HAS THE LESSEE REPORTED THE POLLUTION IN ACCORDANCE WITH

30 CFR 254.46?

Authority: 300(a) Enforcement Action: W/C/S

254.46

INSPECTION PROCEDURE:

Visually check the waters surrounding the facility when approaching, leaving, or passing a facility by boat or helicopter. Observe the waters during the inspection tour. Look for sheens, slicks, waste, and other pollutants originating from the facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC:

1. For pollution or spills observed and the upset condition corrected prior to the inspection.

2. If the operator has not reported the pollution in accordance with 30 CFR 254.46.

Issue a component shut-in (C) INC for the specific component that has been determined to be the cause of pollution.

Issue a facility shut-in (S) INC when more than one specific component has been determined to be the cause of the pollution. Examples: Upset in the production process train that cannot be corrected immediately.

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DELETED PINC

E-100 IS THE LESSEE PREVENTING POLLUTION OF OFFSHORE WATERS AND, IF POLLUTION IS DETECTED, HAS THE LESSEE REPORTED THE POLLUTION IN ACCORDANCE WITH

30 CFR 254.46?

Authority: 300(a) Enforcement Action: W/C/S

254.46

INSPECTION PROCEDURE:

Visually check the waters surrounding the facility when approaching, leaving, or passing a facility by boat or helicopter. Observe the waters during the inspection tour. Look for sheens, slicks, waste, and other pollutants originating from the facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC:

2. For pollution or spills observed but corrected prior to the inspection; or

2. If the operator has not reported the pollution in accordance with 30 CFR 254.46.

Issue a component shut-in (C) INC for the specific component that has been determined to be the cause of pollution.

Issue a facility shut-in (S) INC when more than one specific component has been determined to be the cause of the pollution. Examples: Multiple high water producing wells; upset in the production process train that cannot be corrected immediately; departing oil or gas pipeline leak.

INSPECTION FORM:

Enter one item checked per facility.

REVISED PINC

W-101 IS THE WELL TO OR FROM WHICH A WELL-WORKOVER RIG OR RELATED EQUIPMENT TO BE MOVED EQUIPPED WITH A PUMP THROUGH TYPE TUBING PLUG AND A BACK-PRESSURE VALVE PRIOR TO REMOVING THE TREE AND THE BOP SYSTEM?

Authority: 602 Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Check the operator's records to verify that the well to which the well-workover equipment was moved was equipped with a pump through type tubing plug and a back-pressure valve prior to removing the tree and installing the BOP.
2. If moving operations are in progress during the inspection, verify that the pump through type tubing plug and a back-pressure valve are in place.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that a pump through type tubing plug and back-pressure valve was not installed in the well prior to moving the workover equipment.

Issue a component shut-in (C) INC for the moving operation if moving operations are in progress and a pump through type tubing plug and back-pressure valve is not installed in the well prior to moving the workover equipment.

Note: PINC W-153 should be deleted from the system, as it is duplicated by W-101 PINC that was revised last year. W-101 requires a BPV and a pump through type tubing plug before removing the BOPs or the tree, whereas W-101 only requires the BPV.

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DELETED PINC

W-153 IS THE WELL FROM WHICH A WELL-WORKOVER RIG OR RELATED EQUIPMENT IS TO BE MOVED EQUIPPED WITH A PUMP THROUGH TYPE TUBING PLUG AND A BACK-PRESSURE VALVE PRIOR TO REMOVING THE TREE AND THE BOP SYSTEM?

Authority: 602 Enforcement Action: W/C

Note: A closed SCSSV with the control line disconnected may be used in lieu of a pump through type tubing plug.

INSPECTION PROCEDURE:

1. Check the operator's log to verify that each time a well-workover rig was moved, the well from which it was moved was equipped with a pump through type tubing plug and a back-pressure valve prior to removing the tree and the BOP system.
2. If moving operations are in progress, check the operator's log to verify a pump through type tubing plug and a back-pressure valve are in place.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that a pump through type tubing plug and a back-pressure valve was not installed in a well from which a workover rig was moved prior to removing the BOP system and installing the tree.

Issue a component shut-in (C) INC if moving operations are in progress and a pump through type tubing plug and a back-pressure valve was not installed in the well from which the workover rig is being moved prior to removing the BOP and installing the tree.

INSPECTION FORM:

Enter one item checked per well.

NEW PINC

P-434 ARE PRESSURE VESSELS MAINTAINED, INSPECTED, RATED, REPAIRED, AND ALTERED IN ACCORDANCE WITH THE APPLICABLE PROVISIONS OF THE AMERICAN PETROLEUM INSTITUTE'S PRESSURE VESSEL INSPECTION CODE: MAINTENANCE INSPECTION, RATING, REPAIR, AND ALTERATION API 510 (EXCEPT SECTIONS 6.5 AND 8.5), EFFECTIVE MARCH 15, 2005?

Authority: 198 Enforcement Action: W/C
INSPECTION PROCEDURE:

Verify through records and visual inspection that all pressure vessels are maintained, inspected, rated, repaired, and altered after March 15, 2005 are in accordance with the applicable provisions in API 510 (except sections 6.5 and 8.5).

IF NONCOMPLIANCE EXIST:

Issue a warning (W) INC if the Inspection reveals that the operator is not maintaining, inspecting, rating, repairing and altering pressure vessels in accordance API 510 and there is no immediate threat to personnel or the environment. Issue a component (C) shut in INC if the Inspection reveals that the operator is not maintaining, inspecting, rating, repairing and altering pressure vessels in accordance with API 510 and there is a threat to personnel or the environment.

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REVISED PINC

P-103 IS EACH SURFACE OR SUBSURFACE SAFETY DEVICE, WHICH IS BYPASSED OR BLOCKED OUT OF SERVICE, OUT OF SERVICE DUE TO START-UP, TESTING, OR MAINTENANCE AND IS IT FLAGGED AND MONITORED BY PERSONNEL?

Authority: 803(c)(1) Enforcement Action: C
1004(c)

INSPECTION PROCEDURE:

1. Visually inspect the safety system and identify safety device(s) that are out of service and observe to see if they are flagged and monitored by personnel.
2. Discuss out of service safety devices with the operator to verify that each is out of service only due to start-up, maintenance, or testing.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the component protected by the safety device when the safety device is out of service for reasons other than for maintenance, start-up, or testing, and is not flagged or monitored by personnel.

DELETED PINC

Existing- Delete W

P-103 IS EACH SURFACE OR SUBSURFACE SAFETY DEVICE, WHICH IS BYPASSED OR BLOCKED OUT OF SERVICE, OUT OF SERVICE DUE TO START-UP, TESTING, OR MAINTENANCE AND IS IT FLAGGED AND MONITORED BY PERSONNEL?

Authority: 803(c)(1) Enforcement Action: W/C
1004(c)

INSPECTION PROCEDURE:

1. Visually inspect the safety system and identify safety device(s) that are out of service and observe to see if they are flagged and monitored by personnel.
3. Discuss out of service safety devices with the operator to verify that each is out of service only due to start-up, maintenance, or testing.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a device was placed out of service for start-up, maintenance or testing and the device was inadvertently left out of service. In this case, said device shall be placed in service immediately.

Issue a component shut-in (C) INC for the component protected by the safety device when the safety device is out of service for reasons other than for maintenance, start-up, or testing, and is not flagged or monitored by personnel.

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REVISED PINC

P-280 IS EACH SCSSV INSTALLED IN A WELL TESTED WHEN INSTALLED OR REINSTALLED AND AT INTERVALS NOT EXCEEDING 6 MONTHS AND REMOVED, REPAIRED AND REINSTALLED, OR REPLACED, IF IT DOES NOT OPERATE PROPERLY?

Authority: 804(a)(1)(i) Enforcement Action: W/C

INSPECTION PROCEDURE:

Note: It is recommended that the established leakage rates, of 15 cubic feet of gas and 400 cubic centimeters per minute of oil for subsea wells and 5 cubic feet of gas and 200 cubic centimeters of oil for sub sea wells, be utilized.

1. Review operator records to verify that each SCSSV is tested when installed or reinstalled and at intervals not exceeding 6 months and removed, repaired and reinstalled, or replaced, if it does not operate properly.
2. A sample of the active wells on a multi-well platform may be selected for testing in accordance with API RP 14 B.

Note: Should the holding integrity of the valve be in question, the operator shall be advised that the valve must be tested either in accordance with API RP 14B, Appendix G, or by the use of flow meter.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a review of records does not verify that the SCSSV has been tested at the required interval, but the SCSSV has been tested in the last 6 months.

Issue a component shut-in (C) INC for the well when:

1. A review of records does not verify that the SCSSV has been tested at the required interval and the SCSSV has not been tested in the last 6 months.
2. A sample SCSSV has a leakage rate higher than the maximum allowable as prescribed in API RP 14 B, Appendix G.

DELETED PINC

P-280 IS EACH SCSSV INSTALLED IN A WELL TESTED WHEN INSTALLED OR REINSTALLED AND AT INTERVALS NOT EXCEEDING 6 MONTHS AND REMOVED, REPAIRED AND REINSTALLED, OR REPLACED, IF IT DOES NOT OPERATE PROPERLY?

Authority: 804(a)(1)(i) Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Review operator records to verify that each SCSSV is tested when installed or reinstalled and at intervals not exceeding 6 months and removed, repaired and reinstalled, or replaced, if it does not operate properly.
2. A sample of the active wells on a multi-well platform may be selected for testing in accordance with Appendix 9.

Note: Should the holding integrity of the valve be in question, the operator shall be advised that the valve must be tested either in accordance with API RP 14B, Appendix G, or by the use of flow meter.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a review of records does not verify that the SCSSV has been tested at the required interval, but the SCSSV has been tested in the last 6 months.

Issue a component shut-in (C) INC for the well when:

1. A review of records does not verify that the SCSSV has been tested at the required interval and the SCSSV has not been tested in the last 6 months.
2. A sample SCSSV has a leakage rate higher than the maximum allowable.

INSPECTION FORM:

Enter one item checked for each SCSSV installation inspected.

NEW PINC

L-127 IS EACH OIL PIPELINE EQUIPPED WITH A METERING SYSTEM TO PROVIDE A CONTINUOUS VOLUMETRIC COMPARISON OR A SYSTEM CAPABLE OF DETECTING LEAKS IN A PIPELINE WHEN IT IS REQUIRED BY THE REGIONAL SUPERVISOR?

Authority: 1004(b)(5) Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that each pipeline has a metering system that provides volumetric comparison or a system capable of detecting leaks in a pipeline when required by the Regional Supervisor.
2. Verify that the metering system has an alarm system.
3. Verify that either system is installed and is operational.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when each pipeline does not meet the above requirements or as otherwise required by the District Manager.

INSPECTION FORM:

Enter one item checked for each pipeline inspected.

REVISED PINC

M-110 IS THE SAMPLING DEVICE INSTALLED SUCH THAT THE SAMPLE PROBE IS IN THE CENTER OF THE FLOW PIPING IN A VERTICAL RUN OR DOWNSTREAM OF A MIXING DEVICE IF IN A HORIZONTAL RUN?

Authority: 1202(b) (4) (iii) Enforcement Action: C

INSPECTION PROCEDURE:

Verify the sample probe is in the center of the flow piping in a vertical run or downstream of a mixing device if in a horizontal run by visual inspection.

IF NONCOMPLIANCE EXISTS:

Issue a component (C) shut-in INC if the sample probe is not in the center of the flow piping in a vertical run or downstream of a mixing device if in a horizontal run.

INSPECTION FORM:

Enter one item checked for each meter sample probe inspected.

DELETED PINC

M-110 IS THE SAMPLING DEVICE INSTALLED SUCH THAT THE SAMPLE PROBE IS IN THE CENTER OF THE FLOW PIPING IN A VERTICAL RUN?

Authority: 1202(b)(4)(iii) Enforcement Action: C

INSPECTION PROCEDURE:

Verify the placement of the sample probe by visual inspection.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if the sample probe is not in the center of the flow piping in a vertical run.

INSPECTION FORM:

Enter one item checked for each meter sample probe inspected.

REVISED PINC

M-127 IS THE AVERAGE OF THE RESULTS OF THE FIVE OUT OF SIX CONSECUTIVE RUNS, PRODUCE A DIFFERENCE BETWEEN INDIVIDUAL RUNS OF NO GREATER THAN .05 PERCENT, WITH A MECHANICAL-DISPLACEMENT PROVER USED TO COMPUTE THE METER FACTOR?

Authority: 1202(h)(1) Enforcement Action: C

INSPECTION PROCEDURE:

Verify by on-site inspection or by reviewing calibration records that:

1. Five out of six consecutive runs produce results such that the difference between the results is not greater than 5 percent.
2. The average of the results of the five runs is used to compute the meter factor.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if meter is operating with a meter factor that was not established as per required procedure for mechanical-displacement prover.

DELETED PINC

M-127 IS THE AVERAGE OF THE RESULTS OF THE FIVE OUT OF SIX RUNS WITH A MECHANICAL-DISPLACEMENT PROVER USED TO COMPUTE THE METER FACTOR?

Authority: 1202(h)(1) Enforcement Action: C

INSPECTION PROCEDURE:

Verify by on-site inspection or by reviewing calibration records that:

1. Five out of six consecutive runs produce results such that the difference between the results is not greater than 5 percent.
2. The average of the results of the five runs is used to compute the meter factor.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if meter is operating with a meter factor that was not established as per required procedure for mechanical-displacement prover.

INSPECTION FORM:

Enter one item checked for each mechanical displacement prover inspected.

REVISED PINC

M-131 ARE ALLOCATION METERS MEASURING LESS THAN 50 BARRELS OF OIL PER DAY PROVEN EACH CALENDER QUARTER?

Authority: 1202(k)(4) Enforcement Action: W

INSPECTION PROCEDURE:

Verify by inspection of field records or other appropriate records that allocation meter measuring less than 50 barrels of oil per day is proven at least each calendar quarter.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if allocation meter measuring less than 50 barrels of oil per day has not been proven each calendar quarter..

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DELETED PINC

M-131 ARE ALLOCATION METERS MEASURING LESS THAN 50 BARRELS OF OIL PER DAY PROVEN QUARTERLY?

Authority: 1202(k)(4) Enforcement Action: W

INSPECTION PROCEDURE:

Verify by inspection of field records or other appropriate records that allocation meter measuring less than 50 barrels of oil per day is proven at least quarterly.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if allocation meter measuring less than 50 barrels of oil per day has not been proven in the last 90 days.

CRANES

REVISED PINC

I-102 ARE PROPER CRANE OPERATING PRACTICES FOR ATTACHING AND MOVING THE LOAD BEING UTILIZED IN ACCORDANCE WITH API RP 2D, PARAGRAPHS 3.2.1, 3.2.2 AND 3.2.3 AND API RP 2C, PARAGRAPH 6.5.3.3. ?

Authority: 108 Enforcement Action: C

INSPECTION PROCEDURE:

1. Verify that the load is attached to the hook by means of slings or other suitable devices. Sling use shall be in accordance with the guidelines of API RP 2D, Appendix B, paragraph C.3.2.2.c, and Appendix G, paragraph C.5.2.1.
2. Verify that Hooks are equipped with a latch to retain loose lifting gear under non lifting conditions and that the latch is lockable if the hook is used for transporting personnel.
3. Procedures for moving the load are in accordance with the guidelines of API RP 2D, Appendix B, paragraph C.3.2.3.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if procedures for attaching and/or moving the load are not within specified guidelines.

DELETED PINC

I-102 ARE PROPER CRANE OPERATING PRACTICES FOR ATTACHING AND MOVING THE LOAD BEING UTILIZED IN ACCORDANCE WITH API RP 2D, PARAGRAPHS 3.2.1, 3.2.2 AND 3.2.3?

Authority: 108 Enforcement Action: C

INSPECTION PROCEDURE:

If crane operations are in progress, verify that:

1. Load is attached to the hook by means of slings or other suitable devices. Sling use shall be in accordance with the guidelines of API RP 2D, Appendix B, paragraph C.3.2.2.c, and Appendix G, paragraph C.5.2.1.
2. Procedures for moving the load are in accordance with the guidelines of API RP 2D, Appendix B, paragraph C.3.2.3.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if procedures for attaching and/or moving the load are not within specified guidelines.

INSPECTION FORM:

Enter one item checked per crane inspected.

REVISED PINC

LOAD RATING AND TESTS

I-131 IS THE CORRECT LOAD RATING CHART FOR THE CRANE CONFIGURATION IN USE AT THE PRIMARY CONTROL STATION IN ACCORDANCE WITH API RP 2D, PARAGRAPH 3.2.1?

Authority: 108 Enforcement Action: C

INSPECTION PROCEDURE:

Verify that the load chart is legible, posted and visible in the primary control station for the crane configuration in use.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the crane if the correct load rating chart is not posted and visible at the primary control station for the crane.

DELETED PINC

I-131 IS THE CORRECT LOAD RATING CHART FOR THE CRANE CONFIGURATION IN USE AT THE PRIMARY CONTROL STATION IN ACCORDANCE WITH API RP 2D, PARAGRAPH 3.2.1?

Authority: 108 Enforcement Action: C

INSPECTION PROCEDURE:

Verify that the load chart is posted and visible in the primary control station for the crane configuration in use.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the crane if the correct load rating chart is not posted and visible at the primary control station for the crane.

INSPECTION FORM:

Enter one item checked per crane inspected.

PLATFORM ELECTRICAL SYSTEMS

NEW PINC

BATTERIES

F-103 ARE ALL RECHARGEABLE BATTERY SYSTEMS INSTALLED SUCH THAT HYDROGEN CANNOT COLLECT IN SUFFICIENT QUANTITIES TO CREATE A HAZARD AND TO PROTECT THE BATTERIES IN ACCORDANCE WITH API RP 14F, PARAGRAPHS 10.3.4.2 AND 10.3.4.3, AND API RP 14FZ, PARAGRAPHS 10.3.4.2 AND 10.3.4.3?

Authority: 114 Enforcement Action: C

198

INSPECTION PROCEDURE

Verify that:

1. Rechargeable batteries located inside buildings are installed in enclosures vented to the outside.
2. Rechargeable battery enclosures provide protection against the environment and ensure that falling objects do not accidentally short the batteries.
3. All electrical equipment installed in dedicated battery rooms, except for the batteries and battery leads, are suitable for a Class I, Division 1 Group B classified location.
4. All battery boxes installed on open decks are weather tight and constructed of corrosion resistant materials (e.g., fiberglass, hot dipped galvanized steel).

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if rechargeable battery systems create a hazard.

REVISED PINC

LIGHTING FIXTURES

F-104 ARE LIGHTING FIXTURES INSTALLED IN CLASSIFIED LOCATIONS SUITABLE FOR THE PARTICULAR LOCATION AND PROTECTED FROM DAMAGE IN ACCORDANCE WITH API RP 14F, PARAGRAPHS 9.3.3.3 AND 9.3.3.6, OR API RP 14FZ, PARAGRAPHS 9.3.3.3 AND 9.3.3.6?

Authority: 114 Enforcement Action: C

198

INSPECTION PROCEDURE

Verify that:

1. Lighting fixtures (including ballasts) installed and used in areas classified as Division 1 are explosion proof and Zone 1 is flameproof.
2. Lighting fixtures are properly protected from physical damage by guards or by location.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if explosion proof lighting fixtures are not used in classified areas and not protected from physical damage by guards or by location.

DELETED PINC

F-104 ARE LIGHTING FIXTURES INSTALLED IN CLASSIFIED LOCATIONS SUITABLE FOR THE PARTICULAR LOCATION AND PROTECTED FROM DAMAGE IN ACCORDANCE WITH API RP 14F, PARAGRAPHS 9.3.3.3 AND 9.3.3.6, OR API RP 14FZ, PARAGRAPHS 9.3.3.3 AND 9.3.3.6?

Authority: 114 Enforcement Action: C

198

INSPECTION PROCEDURE

Verify that:

1. Lighting fixtures (including ballasts) installed and used in classified areas (Divisions and Zones) are explosion proof or flameproof.
2. Lighting fixtures are properly protected from physical damage by guards or by location.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if explosion proof lighting fixtures are not used in classified areas and not protected from physical damage by guards or by location.

INSPECTION FORM:

Enter one item checked for each facility inspected.

NEW PINC

WIRING AND GROUNDING

F-121 IS ALL METAL EQUIPMENT, SUCH AS BUILDINGS, VESSELS, AND SKIDS GROUNDED TO THE STEEL STRUCTURE OR GROUNDING NETWORK IN ACCORDANCE WITH API RP 14F, PARAGRAPH 6.10.3, AND API RP 14FZ, PARAGRAPH 6.10.3?

Authority: 114 Enforcement Action: C

198

NOTE: Clips and clamps (e.g., alligator clips and other spring-loaded clamps) are to be employed only as temporary external equipment grounding conductor. They are primarily to insure that personnel are not inadvertently exposed to hazardous voltages when performing repair work on electrical equipment or on facility wiring.

INSPECTION PROCEDURE

Verify that:

1. Fixed outdoor power distribution and utilization equipment (42 volts and above) metal

enclosures are grounded to the steel structure to which they are mounted to or a grounding network by one of the following methods:

- A. Direct contact with the metal deck or welded to the deck.
 - B. An equipment grounding conductor (green, green with yellow stripes, or bare wire) that is installed in the same conduit or cable with current carrying conductors and is effectively attached to the junction box or frame of the equipment.
 - C. An external bonding jumper (green, green with yellow stripes, or bare wire strap) that is installed from the exterior frames of equipment (e.g., motors, metal enclosures and raceways) to a fixed metal structure on the facility. The conductor connection between equipment and metal structure on facility should be continuous without splice and the area of contact shall be cleansed of paint and foreign material.
2. All portable electrical equipment shall be grounded through the grounding conductor in

the supply cable. **Exception:** Approved double insulated hand tools

- A. All single phase and three phase electrical equipment should have a grounding pin

installed in the attached cord.

- B. Cord and plug connected to portable equipment should be visually inspected for external defects (such as loose parts, deformed and missing pins, or damage to outer jacket or insulation) and for evidence of possible internal damage (such as pinched or crushed outer jacket).

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if exposed metal parts of electrical machines or equipment that are not intended to be live but are liable to become energized under fault conditions are not grounded by the methods listed above.

OFFICE PINCS

REVISED PINC

G-802 ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED APPLICATIONS?

Authority: 30 CFR 250.410 Enforcement Actions: W/C/S

30 CFR 250.802

30 CFR 250.900 (b) (c) (d) (e) (f)

30 CFR 250.1202(a)(1)

30 CFR 250.1204(a)

30 CFR 250.1725 (c)

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved application, i.e., APD's, SAFE and SAC charts, etc.

IF NONCOMPLIANCE EXISTS: Issue one warning (**W**) INC for an audit of one or more operations on a facility if the violation(s) of the application(s) poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-in (**C**) INC for an audit of one or more operations if the violation(s) of the application(s) poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility. Issue one facility shut-in (**S**) INC if a violation of the application poses an immediate danger to the entire facility, personnel, or the environment; and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility. **Note:** Do not issue an INC when the operator's safety devices, systems, and equipment are installed and function in accordance with an approved "IN ERROR BY THE PRODUCTION ENGINEER" SAFE chart and Flow Diagram. Approvals made in error by MMS will be communicated to the operators by the production engineer.

DELETED PINC

G-802 ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED APPLICATIONS?

Authority: 30 CFR 250.410 Enforcement Action: W/C/S

30 CFR 250.802 30

CFR 250.1202(a)(1) 30

CFR 250.1204(a)

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved application, i.e., APD's, SAFE and SAC charts, etc.

IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more operations on a facility if the violation(s) of the application(s) poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the application(s) poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility. Issue one facility shut-in (S) INC if a violation of the application poses an immediate danger to the entire facility, personnel, or the environment; and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility. **Note:** Do not issue an INC when the operator's safety devices, systems, and equipment are

installed and function in accordance with an approved "IN ERROR BY THE PRODUCTION ENGINEER" SAFE chart and Flow Diagram. Approvals made in error by MMS will be communicated to the operators by the production

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NOTE: PINC has DPP's listed but the definition is not listed prior to this in the Office PINC Acronyms. **Solution added to the Office PINC acronyms.**

DPP= Development Production Plan= Used in the Pacific.

REVISED PINC

G-803 ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS?

Authority: 30 CFR 250.200 Enforcement Action: W/C/S

30 CFR 254.2

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DPP's, DOCD's, Oil Spill Response Plans, Pipeline Applications and Applications to Permit to Drill etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

DELETED PINC

G-803 ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS? Authority:

30 CFR 250.200 Enforcement Action: W/C/S 30 CFR 254.2 INSPECTION

PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DPP's, DOCD's, Oil Spill Response Plans.

IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility. Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

REVISED PINC RECORDS

G-811 IS REQUIRED PAPERWORK SUBMITTED PRIOR TO CONDUCTING AN ACTIVITY OR OPERATION WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 30 CFR 250.465 Enforcement Action: W/C

30 CFR 250.468
30 CFR 250.513(a)
30 CFR 250.613(a)
30 CFR 250.613(d)
30 CFR 250.1008
30 CFR 250.1202(c)(4)
30 CFR 250.1202(d)(5)
30 CFR 250.1202(f)(2)
30 CFR 250.1203(b)(8)
30 CFR 250.1729
30 CFR 250.1740
30 CFR 250.1743 (b)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.

Issue one component shut-in (C) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

DELETED PINC

RECORDS (Last update -January 2004)

G-811 IS REQUIRED PAPERWORK SUBMITTED WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 30 CFR 250.411 Enforcement Action: W/C

30 CFR 250.465

30 CFR 250.468
30 CFR 250.513(a)
30 CFR 250.613(a)
30 CFR 250.613(d)
30 CFR 250.1008
30 CFR 250.1202(c)(4)
30 CFR 250.1202(d)(5)
30 CFR 250.1202(f)(2)
30 CFR 250.1203(b)(8)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS: Issue one warning (W) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted. Issue one component shut-in (C) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

The following note will be located under the Training “**OFFICE PINC**” heading section. An explanation for the word “**evidence**” is included in 6 of the training PINCS.

Note: Evidence is any documentation of training Associated with training Programs and training results (i.e., testing, interviewing and training etc.)

REVISED PINC

G-843 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?

Authority: 30 CFR 250.1503(b)(1) **Enforcement Action:** W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices. Verify that procedures are being followed by reviewing employee records.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices or documentation fails to support that the procedures are being implemented.

DELETED PINC

G-843 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?

Authority: 30 CFR 250.1503(b)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices.

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REVISED PINC

G-845 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?

Authority: 30 CFR 250.1503(b)(4) **Enforcement Action:** W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis. Verify through records review that the procedures are being implemented.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis or documentation fails to support that the procedures are being implemented.

DELETED PINC

G-845 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS?

Authority: 30 CFR 250.1503(b)(4) **Enforcement Action:** W

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis.

REVISED PINC

G-846 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS AND IS THERE EVIDENCE THAT THE EVALUATIONS ARE BEING CONDUCTED AS PER THE PROCEDURES?

Authority: 30 CFR 250.1503(b)(2) **Enforcement Action:** W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for evaluating the training programs of contractors. Verify through records review that the evaluations are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors or documentation fails to indicate that the contractor evaluations are being conducted.

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DELETED PINC

G-846 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS?

Authority: 30 CFR 250.1503(b)(2) Enforcement Action: W

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors.

REVISED PINC

G-847 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS AND IS THERE EVIDENCE THAT THE INTERNAL AUDITS ARE BEING CONDUCTED AS PER PROCEDURES?

Authority: 30 CFR 250.1503(b)(6) Enforcement Action: W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for internal audits. Verify through records review that the internal audits are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits . or documentation fails to indicate that the internal audits are being conducted.

DELETED PINC

G-847 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS?

Authority: 30 CFR 250.1503(b)(6) Enforcement Action: W

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for internal audits.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits.

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REVISED PINC

G-850 ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES AND IS THERE EVIDENCE INDICATING THAT THE KNOWLEDGE AND SKILLS ARE BEING VERIFIED?

Authority: 30 CFR 250.1506(b) Enforcement Action: W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties. Verify through records review that procedures are being followed

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties or documentation fails to indicate that procedures are being followed.

DELETED PINC

G-850 ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?

Authority: 30 CFR 250.1506(b) **Enforcement Action:** W

INSPECTION PROCEDURE:

Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.

REVISED PINC

G-851 DOES THE LESSEE ENSURE (EITHER THROUGH THE CONTRACTOR EVALUATION OR OTHER METHOD) THAT THE CONTRACTOR'S TRAINING PROGRAM PROVIDES FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?

Authority: 30 CFR 250.1506(c) **Enforcement Action:** W

INSPECTION PROCEDURE:

Verify that the lessee has ensured that contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the lessee has not ensured (either through the contractor evaluation or other method that the contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

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DELETED PINC

G-851 DOES CONTRACTOR'S TRAINING PROGRAM PROVIDE FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?

Authority: 30 CFR 250.1506(c) **Enforcement Action:** W

INSPECTION PROCEDURE:

Verify that the contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.

REVISED PINC

G-852 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES AND IS THERE EVIDENCE THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL HAVE BEEN VERIFIED IN ACCORDANCE WITH THE PROCEDURES?

Authority: 30 CFR 250.1503(b)(3) **Enforcement Action:** W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties. Verify through records review that all employees and contractor personnel have been verified in accordance with the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well-control and production safety operations, can perform their assigned duties or documentation does not indicate that the verification procedures are being followed.

DELETED PINC

G-852 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES?

Authority: 30 CFR 250.1503(b)(3) **Enforcement Action:** W

INSPECTION PROCEDURE:

Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well-control and production safety operations, can perform their assigned duties.

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REVISED PINC

G-855 IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?

Authority: 30 CFR 250.1506(a) **Enforcement Action:** W/C

INSPECTION PROCEDURE:

1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
2. Verify through records reviews that periodic training is conducted to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

Issue one component shut-in (C) INC for each employee that has not received periodic training (in accordance with the plan) to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.

Note: The employee is the component.

DELETED PINC

G-855 IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?

Authority: 30 CFR 250.1506(a) **Enforcement Action:** W/C

INSPECTION PROCEDURE:

1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
2. Verify that periodic training is provided to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

Issue one component shut-in (C) INC for each employee that is not provided periodic training to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.

Note: The employee is the component.

REVISED PINC

G-857 DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN, ORAL, OR HANDS-ON WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?

**Authority: 30 CFR 250.1507(c) (d) Enforcement Action: W
30 CFR 250.1508(a)**

INSPECTION PROCEDURE:

Verify that MMS or its authorized representative is allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.

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DELETED PINC

G-857 DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN OR ORAL WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?

**Authority: 30 CFR 250.1507(c) Enforcement Action: W
30 CFR 250.1508(a)**

INSPECTION PROCEDURE:

Verify that MMS or its authorized representative is allowed to administer written or oral tests at the lessee's work site or onshore location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written or oral tests at the lessee's work site or onshore location.

NOTE: The team agreed on deleting all the inspection form statements at the end of each existing PINC. The information is not captured or used for any purpose in any of the regions anymore.

REVISED PINC

L-841 ARE PIPELINES OUT OF SERVICE FOR 5 YEARS, OR MORE, REMOVED IF THE PIPELINES ARE DETERMINED BY THE REGIONAL SUPERVISOR TO BE OBSTRUCTIONS?

**Authority: 30 CFR 250.1006(b)(3) Enforcement Action: W
30 CFR 250.1752
30 CFR 250.1754**

INSPECTION PROCEDURE:

1. Verify that pipelines out of service for 5 years, or more, and that the Regional Supervisor determines constitute obstructions, are removed.
2. Verify that out-of-service pipelines that are removed are:
 - A. Pigged, unless the Regional Supervisor determines that pigging is not practical.
 - B. Flushed.
 - C. Removed in accordance with the removal procedures and schedule approved by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if the out-of-service pipelines are not removed as required.

DELETED PINC

L-841 ARE DECOMMISSIONED PIPELINES, THAT THE REGIONAL SUPERVISOR TO BE OBSTRUCTIONS, REMOVED?

Authority: 30 CFR 250.1006(b)(3) **Enforcement Action:** W

30 CFR 250.1752

30 CFR 250.1754

INSPECTION PROCEDURE:

1. Verify that pipelines out of service for 5 years, or more, and that the Regional Supervisor determines constitute obstructions, are removed.
2. Verify that out-of-service pipelines that are removed are:
 - D. Pigged, unless the Regional Supervisor determines that pigging is not practical.
 - E. Flushed.
 - F. Removed in accordance with the removal procedures and schedule approved by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if the out-of-service pipelines are not removed as

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required.

NOTE: THE TWO PINCs LIST BELOW is in reference to either completion or paper work; you wouldn't find this violation during drilling operations. Move to office PINC section.

NEW OFFICE PINC

D-823 ARE AT LEAST TWO CEMENTED CASING STRINGS IN THE WELL PRIOR TO PRODUCING THE WELL?

Authority: 428(f) **Enforcement Action:** W

Note: Does not include liners.

INSPECTION PROCEDURE:

Inspect on-site records to verify that at least two casing strings are set and cemented.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if there are not at least two casing strings set prior to producing.

DELETED FIELD PINC

D-174 ARE AT LEAST TWO CEMENTED CASING STRINGS IN THE WELL PRIOR TO PRODUCING THE WELL?

Authority: 428(f) **Enforcement Action:** W

Note: Does not include liners.

INSPECTION PROCEDURE:

Inspect on-site records to verify that at least two casing strings are set and cemented.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if there are not at least two casing strings set prior to producing.

INSPECTION FORM:

Enter one for each string cemented.

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